



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 5**

**\*\*\* REDACTED VERSION \*\*\***

**STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION**

<b>Petition of New York Telephone Company</b>	<b>)</b>	
<b>for Approval of Its Statement of Generally</b>	<b>)</b>	
<b>Available Terms and Conditions Pursuant to</b>	<b>)</b>	
<b>Section 252 of the Telecommunications Act of</b>	<b>)</b>	<b>Case 97-C-0271</b>
<b>1196 and Draft Filing of Petition for InterLATA</b>	<b>)</b>	
<b>Entry Pursuant to Section 271 of the</b>	<b>)</b>	
<b>Telecommunications Act of 1996</b>	<b>)</b>	

**SUPPLEMENTAL REPLY AFFIDAVIT OF JOHN SIVORI  
on Behalf of MCI WorldCom, Inc.**

John Sivori, being sworn upon oath, does hereby depose and state as follows:

1. My name is John Sivori. I am Senior Manager in MCI WorldCom's Information Technology Organization. My duties include the planning and implementation of electronic interfaces for pre-ordering and ordering operations in support of MCI WorldCom's entry into local telecommunications markets in the region served by Bell Atlantic. I testified on behalf of MCI WorldCom, Inc. at the OSS Technical Conference held in Albany, New York, on June 7 - 10, 1999, as well as the OSS Technical Conference held in New York, New York, on July 26 - 28, 1999.

2. The purpose of this affidavit is to respond to the Joint September Reply Affidavit of Julie A. Canny, Stuart Miller, Sean J. Sullivan, R. Michael Toothman and Arthur Zanfini on Behalf of Bell Atlantic-New York ("BA-NY"), filed September 27, 1999 ("BA-NY Aff."), which was filed in response to the Joint Supplemental Affidavit of Darrell Fuquay and John Sivori on Behalf of MCI WorldCom, Inc., filed September 17, 1999 ("MCI WorldCom Aff."). In

**\*\*\* REDACTED VERSION \*\*\***

its Joint Supplemental Reply Affidavit, BA-NY contends that it is not required to provide flow-through for CLEC orders at the same rate it provides for its own retail orders so long as it is able to process current CLEC demand using manual processing. This is plainly wrong. The FCC has recognized that the goal of section 271 is competition at commercial volumes of orders and that flow-through order processing is a prerequisite for such competition. *See Ameritech Michigan Order* ¶ 196. BA-NY is not relieved of its obligation to provide flow-through ordering simply because it is able to provision relatively low volumes of orders using manual processing. Further, BA-NY's attempt to attribute its poor flow-through performance to CLEC ordering errors should be seen for what it is – an attempt to deflect attention from the primary reason underlying BA-NY's poor flow-through performance, namely that BA-NY's systems are designed to cause a significant portion of UNE-P orders to be handled manually.

**BELL ATLANTIC SYSTEM DESIGN IS THE PRIMARY CAUSE OF MANUAL HANDLING OF MCI WORLDCom's UNE-P ORDERS.**

3. In its Joint September Reply Affidavit, BA-NY asks the Commission to excuse its unacceptably poor flow-through rates for UNE-Platform orders. In direct contradiction of all available evidence, BA-NY continues to suggest that CLEC errors are primarily responsible for its lack of flow-through. BA-NY Aff. ¶¶ 11, 13. This is simply not so. In its own affidavit, BA-NY presents three sets of data that demonstrate that a majority of the orders that are falling to manual processing are dropping out due to a combination of BA-NY system design and BA-NY errors. BA-NY Aff., Attachments 1-3.

4. BA-NY cites in its affidavit to three UNE-P order samples it drew from August 23-26 (all CLECs), September 1-10 (all CLECs), and September 15-21 (MCI WorldCom

\*\*\* REDACTED VERSION \*\*\*

orders only). By BA-NY's own admission, of the sampled orders that fell to manual handling, approximately 60% can be attributed to BA-NY system design -- meaning that BA-NY has not yet built the functionality to flow through these orders. In some cases, BA-NY states it has "properly designed" its systems not to flow through certain orders, indicating it has no plans to improve its performance. BA-NY Aff. ¶ 15.

Dates	Number of Manually Handled Orders Sampled by BA-NY	Orders Handled Manually Because of BA-NY System Design	Orders Handled Manually Because of BA-NY System Error	Orders Manually Handled Because of CLEC Error
Aug. 23 - Aug. 26	486	57.61%	8.02%	34.36%
Sept. 1 - Sept. 10	349	65.90%	5.44%	28.65%
Sept. 14 - Sept. 21	** **	** **	** **	** **

BA-NY Aff., Attachments 1-3.

5. For MCI WorldCom in May, June, and July, BA-NY reported flow-through rates of \*\* \*\*, \*\* \*\*, and \*\* \*\*. For August, BA-NY showed some improvement, reaching \*\* \*\* flow-through. Thus, despite improved flow-through performance, BA-NY's systems still caused approximately \*\* \*\* of MCI WorldCom's orders to be handled manually. And of those orders that were manually handled, \*\* \*\* fell to manual handling for reasons solely attributable to BA-NY's systems -- and entirely unattributable to ordering errors.<sup>1</sup>

---

<sup>1</sup>BA-NY continues to suggest that MCI WorldCom is improperly grouping or "batching" orders before it sends them to BA-NY. It should be noted that BA-NY still, however, has not provided any evidence to demonstrate that MCI WorldCom is doing anything improper in its ordering, nor has it supported its reckless suggestion that MCI WorldCom is purposely manipulating orders to cause them to lose flow-through capability. And while BA-NY claims in its affidavit that "the precise effect of MCI's grouping of its orders remains under both parties' scrutiny," BA-NY Aff. ¶ 12, the fact remains that volume of CLEC orders should have no effect whatsoever on BA-NY's ability to flow-through orders, a fact that BA-NY has not denied.

**\*\*\* REDACTED VERSION \*\*\***

6. In its Joint Supplemental Reply Affidavit, BA-NY states that the ongoing study of order flow-through being conducted by Commission Staff bears out the BA-NY analysis that CLEC order errors are a “substantial” cause of orders failing to flow through BA-NY’s systems. BA-NY Aff. ¶ 16. In doing so, BA-NY wholly ignores Staff’s findings, which are supported by BA-NY’s own data, that the most frequently occurring reason that orders do not flow through is because BA-NY has not built the capability to flow those orders through.

7. BA-NY claims that this does not highlight a system deficiency, but rather that it has implemented system “fail-safe[s] . . . to assist CLECs with their market entry efforts.” BA-NY Aff. ¶ 15. This self-serving claim is unsupportable. The sorts of orders that BA-NY’s systems are unable to process include orders involving Company Initiated Blocking, the Ringmate feature, orders placed when a “pending order” already exists in BA-NY’s system, orders for accounts with more than one listing, the migration of less than all of a multi-line customer’s lines, and orders when a customer contract exists on the account. These and other BA system-design problems are system failures – not magnanimous efforts to assist CLEC market entry. The bottom line is that BA-NY’s systems cannot flow through non-complex UNE-P orders for basic POTS service at acceptable rates.

8. Furthermore, the Commission should not accept BA-NY’s invitation to blame the victim. For those orders that drop to manual processing due to alleged CLEC error, BA-NY improperly denies responsibility. As explained in MCI WorldCom’s September 17 Affidavit, a significant percentage of these errors are directly attributable to the fact that MCI WorldCom has not had access to an integratable interface for pre-ordering, and its representatives

**\*\*\* REDACTED VERSION \*\*\***

must rekey pre-order information when creating orders. MCI WorldCom Aff. ¶¶ 17, 19.

Importantly, BA-NY does not deny that the most common CLEC errors causing orders to fall out to manual are the result of errors made during this rekeying process, but still blames MCI WorldCom representatives for their inattention to detail. *See* BA-NY Aff. ¶ 14.

9. The FCC has consistently recognized that the failure of an ILEC to provide CLECs with fully automated processes will result in errors and has rejected the notion that the CLECs are to blame for delays and errors occurring as the result of having to rekey pre-order information. In its BellSouth South Carolina Order, for instance, the FCC rejected BellSouth's attempt to blame CLEC errors when reentering information for its high rejection rate. *Id.* ¶ 157; *see also* Second BellSouth Louisiana Order ¶ 96. The FCC found that the true cause of the problem lay in the fact that "competitors' access to BellSouth's pre-ordering operations support systems is more conducive to errors than is the case for BellSouth's retail operations." BellSouth South Carolina Order ¶ 157. The same holds true here.

**IMPROVED MANUAL HANDLING OF ORDERS IS NOT A SUBSTITUTE FOR ACCEPTABLE FLOW-THROUGH LEVELS.**

10. BA-NY would have the Commission excuse its poor flow-through rates for UNE-P orders because they have not prevented BA-NY from provisioning orders to date. BA-NY Aff. ¶ 9. The Commission should reject BA-NY's request. Whether BA-NY has managed to provision manually the relatively low volume of orders placed by the CLECs today does not absolve BA-NY from its responsibility and commitment under its April 1998 Pre-Filing Statement to flow through "all but the least frequently requested types of orders" at parity with its retail

**\*\*\* REDACTED VERSION \*\*\***

operations. Pre-filing Statement, at 31. The obvious problem with adopting BA-NY's position would be that as order volumes increase to competitive levels, BA-NY will not be able to compensate for its lack of flow-through with manual processing. Recently, in fact, BA-NY indicated to MCI WorldCom that so many orders are already falling to manual handling that BA-NY technicians would prefer an entry in the remarks section of certain orders in order to improve manual order processing.<sup>2</sup> Flow-through rates are thus considered critical measures of ILEC performance, independent of the ILEC's actual provisioning performance.

11. The FCC made just this point in its Ameritech Michigan Order. Ameritech contended that it could address its order processing problems by increasing its capacity to process ordering manually. The FCC rejected this argument, saying that "[a]lthough additional manual processing may constitute a reasonable and necessary short-term solution to address capacity concerns, we do not believe that substantial and continued reliance on manual capacity as a long-term solution to the ordering and provisioning of resale services is consistent with the requirement that there be equivalent access." Ameritech Michigan Order ¶ 196.

12. BA-NY is asking this Commission to embrace the same argument that the FCC rejected. BA-NY does not deny that it must manually process a substantial percentage of CLEC orders and MCI WorldCom orders in particular. Rather, BA-NY argues that the Commission should overlook this deficiency because it has been able to meet its provisioning responsibilities by adding manual capacity. BA-NY Aff. ¶ 9. Similarly, BA-NY claims that it has

---

<sup>2</sup>Telephone conversation between L. Provenzo, MCI WorldCom, and W. Carney, BA-NY (Sept. 29, 1999).



**\*\*\* REDACTED VERSION \*\*\***

improved its manual processing of FOCs and rejects as well. BA-NY Aff. ¶ 10. While MCI WorldCom applauds BA-NY's efforts, improved manual processing is not the answer and will not suffice in the face of commercial volumes of orders. Moreover, even with its improvement in August, BA-NY is still not meeting the required 95% on-time standard for manual FOCs and rejects. BA-NY reports only 87% on-time manual FOC deliveries to CLECs and only 83% for manual rejects.

13. BA-NY may be able to hire sufficient staff on the month in which it files its federal 271 application and when it is only processing 2000 orders per day. There is every reason, however, to question whether this fix will continue to work at higher commercial volumes of orders and after BA-NY's federal 271 application has been resolved.

14. In sum, BA-NY admits that it is today falling significantly short of processing CLEC orders at the same flow-through rates as its retail operations. Moreover, the evidence shows that the bulk of the orders dropping to manual are due to BA-NY system design and BA-NY errors. As explained in MCI WorldCom's September 17 Affidavit, until these basic deficiencies are addressed, MCI WorldCom will be at a significant competitive disadvantage in its efforts to enter the local New York markets.

**\*\*\* REDACTED VERSION \*\*\***

**CONCLUSION**

This concludes the Supplemental Reply Affidavit on Behalf of MCI WorldCom.

On this \_\_\_\_\_ day of September 1999, I hereby swear under penalty of perjury  
that the foregoing is true and correct to the best of my knowledge and belief.

\_\_\_\_\_  
John Sivori

\_\_\_\_\_  
Notary Public



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 6**

STATE OF NEW YORK  
PUBLIC SERVICE COMMISSION

-----X  
Petition of New York Telephone Company for Approval :  
of its Statement of Generally Available Terms and :  
Conditions Pursuant to Section 252 of the : Case 97-C-0271  
Telecommunications Act of 1996; and Draft Filing of :  
Petition for InterLATA Entry Pursuant to Section 271 of :  
the Telecommunications Act of 1996 to Provide In- :  
Region, InterLATA Services in the State of New York :  
-----X

JOINT OCTOBER REPLY AFFIDAVIT OF STUART MILLER,  
SEAN J. SULLIVAN AND ARTHUR ZANFINI  
ON BEHALF OF BELL ATLANTIC - NEW YORK

STATE OF NEW YORK     )  
                              ) ss.:  
COUNTY OF NEW YORK )

Stuart Miller, Sean J. Sullivan and Arthur Zanfini, being duly sworn upon oath, depose  
and state as follows:

1. My name is Stuart Miller. My business address is 1095 Avenue of the Americas,  
26<sup>th</sup> Floor, New York, New York 10036. I previously filed a number of affidavits in this  
proceeding. I also provided testimony in the Technical Conferences held June 7-9, 1999 and  
July 27-30, 1999. My background is set forth in an affidavit I filed on February 18, 1997, in an  
earlier stage of this proceeding.

2. My name is Sean J. Sullivan. My business address is 125 High Street, Boston,  
Massachusetts 02110. My current position is Director, TIS Systems and Infrastructure. I have  
filed two earlier affidavits in this proceeding. My background and responsibilities are described

in the Second July Update Affidavit, filed July 22, 1999. I also provided testimony in the Technical Conferences held June 7-9, 1999 and July 27-30, 1999.

3. My name is Arthur Zanfini. My business address is 140 West Street, 7<sup>th</sup> Floor, New York, New York 10019. My current position is Director – Telecom Industry Services Operations Center (“TISOC”) for Bell Atlantic-North. I previously filed the Joint September Reply Affidavit (“Joint Sept Reply”) and my background and responsibilities are set forth therein.

4. The purpose of this Joint October Reply Affidavit is to respond to claims made in the Supplemental Reply Affidavit filed on October 1, 1999, by Mr. John Sivori on behalf of MCI WorldCom (“MCI”) that addresses the Joint September Reply Affidavit filed by BA-NY on September 27, 1999. Significantly, while MCI’s affidavit is long on argument concerning the level of order flow through, it makes no case whatsoever that BA-NY’s alleged “failure” to achieve a higher flow through rate for MCI’s UNE-Platform orders has created a competitive disadvantage for MCI in the local market. In fact, the evidence plainly shows that MCI has not been subjected to any competitive damage because of the level of flow through. (Joint Sept Reply ¶ 9.) Thus, there is simply no factual basis for MCI’s conclusory argument that BA-NY’s systems cannot flow through orders “at acceptable rates.” (MCI ¶ 7.) On the contrary, the uncontroverted evidence shows that, if MCI truly desired to increase its achieved level of flow through order processing, it could do so by improving the work effort quality of its own personnel. Yet MCI indicates no inclination to act. (MCI ¶ 8.)

5. There is an Exhibit associated with this Affidavit, containing one document labeled as Attachment 1.

6. The MCI reply affidavit quickly passes over the fact that its own order flow through has risen over the past four months from \*\*

\*\*\* in August. (MCI ¶ 5.) Similarly, the MCI reply affidavit ignores entirely that the original bases for its discontent – the “failure” of BA-NY processes to deliver firm order commitments (“FOCs”) and reject notices timely – has similarly been negated by responsive BA-NY efforts. (Joint Sept Reply ¶ 10.) Significant progress has already been made in precisely those areas where MCI claimed it was necessary.

7. MCI’s reply affidavit does not contest the validity of the studies BA-NY has presented. Thus, both parties agree that BA-NY system error is only a small factor in the failure of orders to flow through to provisioning without manual processing. (See chart at MCI Reply ¶ 4.)<sup>1</sup> MCI does not contend that CLEC ordering errors are not a substantial cause of unnecessary manual processing. On the contrary, every study conducted indicates that the level of CLEC error is four to five times larger than the level of BA-NY system error. (*Id.*) There is simply no question that overall flow through levels could be raised significantly by the reduction in CLEC ordering errors.

8. Steps already underway should continually diminish CLEC error as a source of order fallout. First, as more CLECs take advantage of the availability of integrateable pre-order and ordering systems, CLEC errors will go down. As KPMG reported, CLECs have the ability to create that integrated system, and at least one CLEC has done so. Moreover, MCI stated at the Oral Argument held five weeks ago that it was on the verge itself of integrating the two “most important” pre-ordering records via EDI. (Joint Sept Reply ¶ 14.)

---

<sup>1</sup> For example, the uncontested evidence shows that in August BA-NY system errors accounted for only \*\*  
\*\*\* of all MCI orders routed to manual processing. By contrast, MCI’s own errors caused \*\*  
\*\*\* of its orders to be routed for manual processing \*\*

9. Further, in order to help CLECs reduce their level of order errors, BA-NY will initiate monthly workshops to address specifically the improvement of Local Service Request (“LSR”) order quality. BA-NY will provide generic examples of LSRs that failed to meet flow through criteria and suggested steps for improvement. This will serve to improve CLEC order quality, reduce LSR rejects, and improve the overall flow through rate. Bell Atlantic will also continue to work individually with CLECs to address their specific and unique order quality concerns. Continued efforts at reducing CLEC errors have the potential of raising the overall flow through rate by as much as 15%.

10. On the facts, the only thing that truly distinguishes the parties’ respective positions is that MCI attempts to blame BA-NY for the orders that are not designed to flow through, but rather are routed intentionally to TISOC representatives for special handling. Here MCI contends that BA-NY has not met its commitments for order flow through capability set forth in the Pre-filing Statement (“PFS”), dated April 6, 1998. (MCI ¶ 10.) This contention is simply incorrect, as discussed in detail in the attached letter of BA-NY counsel to Administrative Law Judge Jaclyn A. Brillling, dated October 8, 1999. (Exhibit, Attachment 1.) BA-NY has met its PFS commitment to enable CLEC orders to flow through to provisioning.

11. Once its PFS claim is removed, MCI basically argues that – as a matter of system design – BA-NY *should not* route the orders at issue to TISOC for manual handling. (MCI ¶ 7.) BA-NY is willing to act on a number of the proposals for additional flow through made by MCI and the other CLECs. The several studies of existing platform traffic that have been shared at recent Carrier-to-Carrier meetings detail the reasons CLEC orders currently fall out from Level 5 flow through processing, both as a matter of design and due to common CLEC errors. Based on these studies, and on the coding resources available, BA-NY proposes the following systems



**\* \* \* REDACTED VERSION \* \* \***

changes to increase overall flow through levels. In all cases, the expected results assume that, absent the reason the error message was generated, the order would otherwise flow through.

12. These changes are in three groups. The first group can be implemented as soon as October 30, 1999:

<b>Error Number</b>	<b>Reason Number Generated</b>	<b>Change</b>
DOEE113	Listing address on platform order does not match listing address on CSR	Order rejected
DOEE113	Can Be Reached number on platform order is invalid	Order rejected
DOEE113	BA Retail Blocking exists on line in platform order	Order will flow through with retail blocking removed
DOEE155	Call Forward II package improperly placed on platform order	Order rejected (See Phase II related item)
UNEE163	Invalid blocking code or unauthorized NXX on platform order	Order rejected

13. The "Phase II" changes can be made by December 18, 1999:

Error Number	Reason Number Generated	Change
DOEE135	CLEC orders partial migration on platform order without properly identifying new BTN	Order rejected
DOEE135	Ringmate ordered as part of platform	Ringmate will flow through as part of platform at Level 5
DOEE135	Additional listing exists on account in platform order	Additional listing will flow through at Level 5
DOEE135	Coin line ordered as part of platform	Coin line ordered as part of platform will flow through at Level 5
DOEE145	CLEC orders partial migration of account on platform order	Partial migrations of accounts will flow through at Level 5
DOEE155	Call Forward II package improperly placed on platform order	Component parts of Call Forward II package will flow through at Level 5 (See Phase I related item)

14. The "Phase III" changes require significantly more resources, and with the implementation of LSOG 4 in February 2000, cannot be completed until the 2<sup>nd</sup> Quarter of 2000.

The Phase III changes are:

Error Number	Reason Number Generated	Change
DOEE113	Account on platform order contains a contract	Platform orders on accounts with contracts will flow through at Level 5
DOEE135	CLEC to CLEC Migrations on platform order (Current AECN does not equal request AECN)	CLEC to CLEC migrations on platform orders will flow though at Level 5
DOEE135	CLEC requests BTN number change on platform order	CLEC request for BTN change will flow through at Level 5
DOEE136	Form LSR Data:1 for Tag jk (supplemental order requesting cancellation of platform order)	<p>If CLEC order is pending, the cancellation will flow through at Level 5.</p> <p>If CLEC order is completed, cancellation will be rejected with message indicating CLEC should submit a disconnect order.</p>

15. Based on the existing data sampled in September, the Phase I changes will result in at least an additional 10-15% in overall platform flow through over existing levels. Phase II changes will result in an additional 15-20% in overall platform flow through over existing levels. Phase III changes will result in an additional 20-25% in overall platform flow through over existing levels.

16. BA-NY is mindful that a number of these system change proposals must proceed through the Change Control process as Type “4” changes. If there is a change to the business rules or interface resulting from the introduction of flow through or the rejection of an order consistent with the existing business rules, the current process calls for CLECs to be provided

with updated system documentation at least 66 days in advance of the change. However, BA-NY would be willing to implement these changes sooner than the standard change control interval if this acceleration is supported by other CLECs in the Change Control process. BA-NY suggests that a Change Control meeting be called no later than October 18 to determine whether the industry wishes to accelerate these changes. If the introduction of flow through or the rejection of an order consistent with the existing business rules results in no change to the interface or business rules, then BA-NY will provide notice to the CLECs in advance of the implementation date consistent with the change control process.

17. BA-NY again reiterates its commitment to work with MCI and other interested CLECs to achieve higher order flow through rates on their orders. BA-NY will do its part to succeed in this endeavor by taking the steps outlined herein as well as other steps that may in the future appear to be necessary. These commitments do not in any way negate the fact that BA-NY's ordering systems are today properly fulfilling BA-NY's obligations under the Act and the PFS to support the competitive efforts of MCI and other CLECs in the local New York market.

18. This concludes this Joint October Reply Affidavit.

I hereby swear, under penalty of perjury, that the foregoing is true and correct, to the best of my knowledge and belief.

---

Stuart Miller

Sworn to before me this \_\_\_\_ day of October  
1999.

---

Notary Public

---

Sean J. Sullivan

Sworn to before me this \_\_\_\_ day of October  
1999.

---

Notary Public

---

Arthur Zanfini

Sworn to before me this \_\_\_\_ day of October  
1999.

---

Notary Public

**\* \* \* REDACTED VERSION \* \* \***

EXHIBIT REFERRED TO IN THE  
JOINT OCTOBER REPLY AFFIDAVIT OF STUART MILLER,  
SEAN J. SULLIVAN AND ARTHUR ZANFINI  
ON BEHALF OF BELL ATLANTIC - NEW YORK

ATTACHMENT 1

**Bell Atlantic**  
1095 Avenue of the Americas  
New York, NY 10036  
37th Floor  
Tel 212 395-6495  
Fax 212 768-7568

**William D. Smith**  
Counsel



October 8, 1999

**BY HAND**

Administrative Law Judge  
Jaclyn A. Brillling  
New York State Public Service Commission  
Three Empire State Plaza  
Albany, New York 12223-1350

**Re: Case 97-C-0139 – Status of Pre-filing Statement Flow Through Commitments**

Dear Judge Brillling:

You have asked New York Telephone Company, d/b/a Bell Atlantic - New York ("BA-NY"), to review the status of the commitments regarding order flow through that were delineated in the April 6, 1998 Pre-filing Statement (the "PFS"). BA-NY made two specific commitments regarding the flow through of orders. First, it committed to flow through all orders types listed in Appendix 2 to the Pre-filing Statement either by the end of April 1998 or August 1998. (See PFS at 31 and Appendix 2.) As previously indicated to the Commission, BA-NY has provided order flow through for all the order types set forth in Appendix 2 of the Pre-filing Statement. (See Letter to the Honorable John C. Crary from Paul A. Crotty, dated August 21, 1998.) In addition, the recent KPMG test confirmed that BA-NY has provided flow through capabilities for all of these orders. (See "Bell Atlantic OSS Evaluation Project Final Report," submitted by

KPMG (dated August 6, 1999), Table IV-7.3 at POP 7-IV 154-155.<sup>1</sup> Thus, BA-NY has fully satisfied its commitment regarding flow through for the order types listed in Appendix 2.

Second, BA-NY committed to provide order flow through for all the orders listed in Appendix 3 to the Pre-filing Statement *after* August 1998. (PFS at 31 and Appendix 3.) Contrary to the claims of some parties, BA-NY did not commit to provide flow through of these order types prior to submitting its Section 271 Application to the Federal Communication Commission or prior to entry into the long distance market. Nothing in the Pre-filing Statement indicates or even implies such a commitment. To the contrary, the sensible approach embodied in the Pre-filing Statement was to provide flow through for these order types (as well as other, unlisted order types) as increasing CLEC use of the order types suggested which additional flow through capabilities would be most efficient. The Commission and Senior Staff were well aware that this was BA-NY's intent at the time the Pre-filing Statement was submitted.

Using this criterion, BA-NY has modified its systems so that the following order types listed in Appendix 3 now have flow through capability:

**A. Resale**

- Hunting
- Partial Acquisition (Not BTN)
- Outside moves
- Call answering
- Suspensions (Seasonal)
- Restorals (Seasonal)
- Ringmate

**B. UNE**

- New Link
  - 10 new links or greater completed in Level 4

---

<sup>1</sup> Table IV-7.3 lists all of the items set forth in Appendix 2, except for the exception indicators "Remarks data on resale form only" (Resale) and "Remarks data only" (Platform). BA-NY has confirmed that these two items do not prevent flow through of any Resale or Platform order types.



- Partial Migration
  - Additional listings
  - Any listings other than NLST for INP, and that is changing from existing listings
- Supplements on non-confirmed orders
- Full Migration
  - Additional listings
  - Any listings other than NLST for INP, and that is changing from existing listings<sup>2</sup>

Furthermore, in response to market demands, BA-NY has provided flow through capability for the following order types not listed in Appendices 2 or 3:

**A. Resale**

- Listings
  - Change (add, change, delete) Simple

**B. UNE**

- LNP – Standalone
  - Full Migration
  - Partial Migration without BTN change
  - Loop with LNP
- Post Migration Loop – Delete Loops
- Post Migration Loop with INP – Delete INP arrangements
- Listings – Changes (add, change, delete) Simple
- Loop
  - Increase Migrate limitations to 99

**C. Platform**

- Post Migration – Subsequent Activity Changes (adds, change, deletes)
  - Features (Simple)
  - Blocking
  - PIC/LPIC/Freeze PIC
  - Telephone # NOT BTN
- Post Migration

---

<sup>2</sup> Some confusion has arisen because the nomenclature used in some error codes for orders that do not flow through is similar to nomenclature used for some order types listed in both Appendices 2 and 3. This became apparent during a recent Carrier-to-Carrier meeting during which BA-NY reviewed the top eleven reasons that specific orders from three samples did not flow through. BA-NY will provide a written explanation regarding each of the concerns and issues that the parties raised in relationship to the error codes from the samples that were reviewed.

- Delete a Line
- Post Migration
  - Suspend and Restore
- Listings – Changes (add, change, delete) Simple
  - Associated to UNE-Platform
- Post Migration – Additional Listings

While there is no existing schedule for the implementation of flow through for the items from Appendix 3 that do not appear above, it is in BA-NY's own interest, as well as the CLECs' interests, to provide the most efficient methods and systems to process the flow of wholesale orders. As noted, BA-NY will continue to monitor the volumes associated with the order types received from CLECs to determine whether flow through capability should be introduced for any of these order types.<sup>3</sup>

BA-NY will be prepared to discuss the above information at the next Carrier-to-Carrier meeting.

Respectfully submitted,

William D. Smith

Attachment

cc: All Active Parties (Via Overnight and E-mail Delivery)

---

<sup>3</sup> Attached is a chart that displays, as of October 1, 1999, the flow through capability of the order types listed in Appendices 2 and 3 of the Pre-filing Statement and in the subsequent milestone letters.

1	Conversion with and without changes		4/6/98		Y	Y			
2	PIC modifications	✓	4/6/98			Y	Y		
3	PIC Freeze	✓	4/6/98			Y	Y		
4	Custom Calling features (changes, adds, deletes)								
5	Call Waiting	✓	4/6/98			Y	Y	Y	
6	3-Way calling	✓	4/6/98			Y	Y	Y	
7	Call Forwarding	✓	4/6/98			Y	Y	Y	
8	Speed Calling 8 & 30	✓	4/6/98			Y	Y	Y	
9	Touch Tone	✓	4/6/98			Y	Y	Y	
10	Full Disconnect	✓	4/6/98					Y	
11	Optional Calling Plans	✓	4/6/98			Y	Y	Y	
12	Class of Svc	✓	4/98				Y	Y	
13	Cust/co initiated blk	✓	4/98			Y	Y	Y	
14	RMKS data on resale form (only delete of an auxiliary line)	✓	4/98			Y	Y	Y	
15	Phone Smart	✓	4/98			Y	Y	Y	
16	Oper Svc	✓	4/98			Y	Y	Y	
17	New Line	✓	4/98	Y					
18	Simple listings	✓	4/98	Y					
19	Valueflex	✓	5/98	Y					
20	Call forwarding II	✓	4/98	Y					
21	Hunting	✓	> 8/98	Y		Y	Y	Y	Series & circular
22	Partial acquisition	✓	> 8/98	Y			Y		Aux only
23	Complex Listings	✓	> 8/98	N	N	N	N		Straight line listings only
24	Call Answering	✓	> 8/98	Y		Y	Y	Y	
25	Modifications/cancels	✓	> 8/98	Y	Y	Y	Y	Y	Modifications sent on non confirmed original orders/no cancels
26	Outside moves	✓	> 8/98					Y	
27	Suspensions	✓	> 8/98					Y	Seasonal, both full and partial
28	Restorals	✓	> 8/98					Y	Seasonal, both full and partial
29	Intellidial	✓	> 8/98	N	N	N	N	N	
30	Direct Inward dialing	✓	> 8/98	N	N	N	N	N	
31	Ringmate	✓	> 8/98	Y	Y	Y	Y	Y	
32	Flexpath	✓	> 8/98	N	N	N	N	N	Design service

New-New Service, CAI-Convert as is, CWC-Covert with changes, CAS-Convert as specified, PM-Post Migration

Y-In Production

N-Not Complete

1	Basic Link	✓	4/98	Y		1-9 loops only
2	Partial migration w/o INP	✓	4/98		Y	INP is no longer offered
3	Partial migration of existing svc w/INP - RCF	✓	4/98		Y	INP is no longer offered
4	Full migration of existing svc w/o INP	✓	4/98		Y	INP is no longer offered
5	Full migration of existing svc w/INP - RCF	✓	4/98		Y	INP is no longer offered
6	Premium Link	✓	4/98	Y		
7	Addition of new link to existing account	✓	4/98			Y
8	New basic link					
9	10 new links or greater completed in L4	✓	> 8/98	Y		Up to 99
10	If SBN not established	✓	> 8/98	N		
11	Expedites	✓	> 8/98	N		
12	Supplemental activity	✓	> 8/98	Y		Modifications sent on non confirmed original orders/no cancels
13	Partial migration					
14	Premium Link	✓	> 8/98		Y	For 1-9 loops
15	If SBN is not established	✓	> 8/98		N	
16	Complex and additional listings	✓	> 8/98	Y		Straight line additional line listing
17	Any listing other than NLST for INP, and that is changing from existing listing	✓	> 8/98			INP No longer applicable
18	Migrate BTN and create new BTN	✓	> 8/98		Y	taking BTN L2
19	Hunting	✓	> 8/98	N	N	
20	DPA's	✓	> 8/98	N	N	
21	Expedites	✓	> 8/98	N	N	
22	Supplemental activity	✓	> 8/98		Y	Modifications sent on non confirmed original orders/no cancels
23	Full migration					
24	Premium links	✓	> 8/98		Y	
25	If SBN not established	✓	> 8/98		N	
26	Complex and additional listings	✓	> 8/98	Y	Y	Straight line listings only
27	Any listing other than NLST for INP, and that is changing from existing listing	✓	> 8/98	Y	Y	Straight line listings
28	Hunting	✓	> 8/98	N	N	
29	DPA's	✓	> 8/98	N	N	
30	Expedites	✓	> 8/98	N	N	
31	Supplemental activity	✓	> 8/98		Y	Modifications sent on non confirmed original orders/no cancels
32	Post Migration - Delete loops	✓	8/21/98 ltr			Y
33	Loops with LNP	✓	8/21/98 ltr		Y	
34	LNP standalone					
35	Full migration	✓	8/21/98 ltr		Y	
36	Partial migration without BTN change	✓	8/21/98 ltr		Y	
37	Listing changes					

New-New Service, CAI-Convert as is, CWC-Covert with changes, CAS-Convert as specified, Con-Convert, PM-Post Migration

# Bell Atlantic

PFS Flow Through Implemented as of 10/1/99

38	w/LNP/INP	✓	8/21/98 ltr			Y	INP is no longer offered
39	Loop	✓	8/21/98 ltr			Y	
40	Loops off an EEL	✓	8/21/98 ltr			Y	Delete loop
41	Increase Migrate limitations to 99	✓	10/26/98 ltr		Y	Y	L4

New-New Service, CAI-Convert as is, CWC-Covert with changes, CAS-Convert as specified, Con-Convert, PM-Post Migration

Y-In Production

1	Migration of existing account "as is"	✓	4/98		Y				
2	Migration of existing account "as specified"								
3	Plus or minus								
4	Call Waiting	✓	4/98				Y		
5	3-Way calling	✓	4/98				Y		
6	Call Forwarding	✓	4/98				Y		
7	speed Calling 8 & 30	✓	4/98				Y		
8	Touch tone	✓	4/98				Y		
9	PIC modifications including PIC Freeze	✓	4/98				Y		PIC & LPIC
10	Cust/Co initiated Blkg	✓	4/98				Y		CLEC/end user
11	Rmks Data only delete an auxiliary line	✓	4/98				Y		
12	Phonesmart	✓	4/98				Y		
13	Call Forwarding II	✓	4/98				Y		
14	Post migration Subsequent activity Changes (adds, changes, deletes)								
15	Delete a line	✓	8/21/98 ltr					Y	
16	Suspend and Restore	✓	8/21/98 ltr					Y	Seasonal
17	SNP & Restore	✓	8/21/98 ltr					Y	One way & two way
18	Features - Simple	✓	8/21/98 ltr					Y	
19	Telephone # not BTN	✓	8/21/98 ltr					Y	Telephone number change
20	Blocking	✓	8/21/98 ltr					Y	
22	PIC modifications including PIC Freeze	✓	8/21/98 ltr					Y	PIC & LPIC
23	Directory Lisitngs	✓	10/26/98 ltr					Y	Changes on straight line - main listings & additional listings

New-New Service, CAI-Convert as is, CWC-Covert with changes, CON-Convert, CAS-Convert as specified, PM-Post Migration



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 7**



**THIS DOCUMENT IS PROPRIETARY  
AND HAS BEEN REDACTED**



**JOINT DECLARATION OF  
SHERRY LICHTENBERG AND  
JOHN SIVORI**

**ATTACHMENT 8**

### ***Bell Atlantic Reference Materials:***

The following documentation was utilized in compiling the specifications within this report.

1. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.0, 6/9/98.
2. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.1, 7/2/98.
3. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.2, 7/4/98.
4. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.3, 7/6/98.
5. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.4, 7/9/98.
6. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.5, 7/10/98.
7. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.6, 7/15/98.
8. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.7, 7/17/98.
9. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.8, 7/20/98.
10. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9, 7/22/98.
11. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9a, 8/10/98.
12. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9b, 8/7/98.
13. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9c, 8/10/98.
14. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9d, 8/13/98.
15. Bell Atlantic North EDI User Guide, Version 1, 6/9/98.
16. Bell Atlantic North EDI User Guide, Version 1.1, 7/2/98.
17. Bell Atlantic North EDI User Guide, Version 1.1, 7/7/98.
18. Bell Atlantic North EDI User Guide, Version 1.5, 7/10/98.
19. Bell Atlantic North EDI User Guide, Version 1.7, 7/17/98.
20. Bell Atlantic North EDI User Guide, Version 1.8, 7/22/98.
21. Bell Atlantic North EDI User Guide, Version 1.9, 7/22/98.
22. Bell Atlantic North EDI User Guide, Version 1.9a, 8/10/98.
23. Bell Atlantic North EDI User Guide, Version 1.9c, 8/12/98.
24. Bell Atlantic North EDI User Guide, Version 1.9d, 8/13/98.
25. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9e, 9/4/98.
26. Bell Atlantic North EDI User Guide, Version 1.9e, 9/4/98.
27. Bell Atlantic EDI User Guide, Version 2.0, 9/18/98.
28. Bell Atlantic Pre Order Format and Business Rules Guide, Version 2.1, 12/4/98.
29. Bell Atlantic EDI Guide for Local Service Requests and Pre Order Inquiries, Version 2.1, 12/4/98.
30. Bell Atlantic Flash Announcement 12/11/98.
31. Bell Atlantic CR#540 Flash Announcement 1/26/99.
32. Bell Atlantic Pre Order Format and Business Rules Guide, Version 2.2, 3/14/99.
33. Bell Atlantic Flash Announcement #623, 3/29/99.
34. Bell Atlantic Flash Announcement #612, 3/25/99.
35. Bell Atlantic Flash Announcement #626, 3/31/99.
36. Bell Atlantic Pre Order Business Rules, Version 2.3, June 1999.
37. Bell Atlantic Pre Order EDI Guide, Version 2.3, June 1999.
38. Bell Atlantic Flash Announcement #736, 5/24/99.
39. Bell Atlantic Flash Announcement #673, 5/22/99.
40. Bell Atlantic Flash Announcement #672, 5/22/99.
41. Bell Atlantic Flash Announcement #796, 7/7/99.
42. Bell Atlantic Flash Announcement #748, 6/8/99.
43. Bell Atlantic Flash Announcement #743, 5/27/99.
44. Bell Atlantic Flash Announcement #742, 5/26/99.
45. Bell Atlantic Flash Announcement #699, 5/21/99.
46. Bell Atlantic Flash Announcement #795, 7/7/99.
47. Bell Atlantic Pre Order Business Rules, Version 2.4, June/August 1999.
48. Bell Atlantic Pre Order Business Rules, Version 2.4.1, July/August 1999.
49. Bell Atlantic Overview for CR 670, Project Live Wire, 8/4/99.
50. Bell Atlantic Flash Announcement #825, 7/27/99 & 7/23/99.
51. Bell Atlantic Flash Announcement #846, V2.4.2, 7/27/99.
52. Bell Atlantic Flash Announcement #878, 8/11/99.

53. Bell Atlantic Flash Announcement #880, 8/11/99.
54. Bell Atlantic Flash Announcement #887, 8/19/99.
55. Bell Atlantic Flash Announcement #885, 8/20/99.
56. Bell Atlantic Flash Announcement #902, 8/26/99.
57. Bell Atlantic Pre Order Business Rules, Version 2.5, August/October 1999.
58. Bell Atlantic Pre Order Business Rules, Version 2.5.1, September/October 1999.
59. Bell Atlantic Flash Announcement #940, 9/17/99.
60. Bell Atlantic Flash Announcement #944, 9/17/99.
61. Bell Atlantic Flash Announcement #921, 9/19/99.
62. Bell Atlantic Flash Announcement #961, 9/23/99

## ***10. Reference Materials (total inclusive listing of all materials utilized in compiling MCIW business specifications – Pre Order)***

The following documentation was utilized in compiling the specifications within this report.

63. Local Service Ordering Guide (LSOG), Issue 3, April 13, 1998.
64. Local Service Ordering Guide (LSOG), Issue 2, April 1997.
65. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.0, 6/9/98.
66. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.1, 7/2/98.
67. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.2, 7/4/98.
68. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.3, 7/6/98.
69. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.4, 7/9/98.
70. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.5, 7/10/98.
71. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.6, 7/15/98.
72. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.7, 7/17/98.
73. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.8, 7/20/98.
74. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9, 7/22/98.
75. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9a, 8/10/98.
76. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9b, 8/7/98.
77. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9c, 8/10/98.
78. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9d, 8/13/98.
79. MCI Management Report – Overview of Inquiry Type and Inquiry Activity for Bell Atlantic North, Version 1.0, 7/21/98.
80. MCI Management Report – Introduction to Pre Order & Inquiry, Version 2.0, 7/27/98
81. Bell Atlantic North EDI User Guide, Version 1, 6/9/98.
82. Bell Atlantic North EDI User Guide, Version 1.1, 7/2/98.
83. Bell Atlantic North EDI User Guide, Version 1.1, 7/7/98.
84. Bell Atlantic North EDI User Guide, Version 1.5, 7/10/98.
85. Bell Atlantic North EDI User Guide, Version 1.7, 7/17/98.
86. Bell Atlantic North EDI User Guide, Version 1.8, 7/22/98.
87. Bell Atlantic North EDI User Guide, Version 1.9, 7/22/98.
88. Bell Atlantic North EDI User Guide, Version 1.9a, 8/10/98.
89. Bell Atlantic North EDI User Guide, Version 1.9c, 8/12/98.
90. Bell Atlantic North EDI User Guide, Version 1.9d, 8/13/98.
91. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 1.0, 6/26/98.
92. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 1.1, 6/30/98.
93. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 1.2, 7/1/98.
94. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 2.0, 7/6/98.
95. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 2.1, 7/9/98.
96. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 2.2, 7/14/98.
97. Pre Ordering MCI & BA-N – Summary Issues Listing, Version 2.3, 7/20/98.
98. Bell Atlantic Address Inquiry and Response matrices, 8/18/98.

99. MCI Pre Order Interface Data Format (IDF), Version 1, 9/1/98.
100. Bell Atlantic North Pre Order Inquiry Process Transaction Guide, Version 1.9e, 9/4/98.
101. Bell Atlantic North EDI User Guide, Version 1.9e, 9/4/98.
102. OBF Issue #1269 (Customer Service Information) – Final Closure 4/23/98.
103. OBF Issue #1368 (Directory Query Capability) – Initial Closure 4/23/98.
104. OBF Issue #1604 (TOS field) – Final Closure 4/24/98.
105. OBF Issue #1605 (INQRES#) – Final Closure 8/25/98.
106. OBF Issues #1525 and #1526 (LATI) – Initial Closure 8/5/98.
107. OBF Issue #1527 (Service Configuration) – Initial Closure 8/5/98.
108. Bell Atlantic CLEC Handbook Series, Volume III, Section 6 (October 1998), Directory.
109. MCIW Consolidated Issues Tracking Log – Bell Atlantic North.
110. Bell Atlantic EDI User Guide, Version 2.0, 9/18/98.
111. MCIW Business Specifications – Pre Order and Inquiry, Draft A, 11/20/98.
112. Bell Atlantic Pre Order Format and Business Rules Guide, Version 2.1, 12/4/98.
113. OBF Issue #1671 (Pre Order Clean Up).
114. OBF Issue #1705 (Exception Reporting).
115. Bell Atlantic EDI Guide for Local Service Requests and Pre Order Inquiries, Version 2.1, 12/4/98.
116. OBF Issue #1278 (Pre Order) Final Closure 11/7/97.
117. OBF Issue #1712 (TN & TER fields) Final Closure 11/6/98.
118. OBF Issue #1733 (Service & Feature by Switch) Accepted 8/28/98.
119. Bell Atlantic Flash Announcement 12/11/98.
120. Bell Atlantic CR#540 Flash Announcement 1/26/99.
121. Bell Atlantic Pre Order Format and Business Rules Guide, Version 2.2, 3/14/99.
122. Bell Atlantic Flash Announcement #623, 3/29/99.
123. Bell Atlantic Flash Announcement #612, 3/25/99.
124. Bell Atlantic Flash Announcement #626, 3/31/99.
125. Bell Atlantic Pre Order Business Rules, Version 2.3, June 1999.
126. Bell Atlantic Pre Order EDI Guide, Version 2.3, June 1999.
127. Bell Atlantic Flash Announcement #736, 5/24/99.
128. Bell Atlantic Flash Announcement #673, 5/22/99.
129. Bell Atlantic Flash Announcement #672, 5/22/99.
130. Bell Atlantic Flash Announcement #796, 7/7/99.
131. Bell Atlantic Flash Announcement #748, 6/8/99.
132. Bell Atlantic Flash Announcement #743, 5/27/99.
133. Bell Atlantic Flash Announcement #742, 5/26/99.
134. Bell Atlantic Flash Announcement #699, 5/21/99.
135. Bell Atlantic Flash Announcement #795, 7/7/99.
136. Bell Atlantic Pre Order Business Rules, Version 2.4, June/August 1999.
137. Bell Atlantic Pre Order Business Rules, Version 2.4.1, July/August 1999.
138. Bell Atlantic Overview for CR 670, Project Live Wire, 8/4/99.
139. Bell Atlantic Flash Announcement #825, 7/27/99 & 7/23/99.
140. OBF Issue #1834 (Address Standardization), active 2/12/99.
141. OBF Issue # (TBD) (CSI Clean-up), active 7/19/99.
142. Bell Atlantic Flash Announcement #846, V2.4.2, 7/27/99.
143. Bell Atlantic Flash Announcement #878, 8/11/99.
144. Bell Atlantic Flash Announcement #880, 8/11/99.
145. OBF Issue #1881 (xDSL Loop Qualification), active.
146. Bell Atlantic Flash Announcement #887, 8/19/99.
147. Bell Atlantic Flash Announcement #885, 8/20/99.
148. Bell Atlantic Flash Announcement #902, 8/26/99.
149. Bell Atlantic Pre Order Business Rules, Version 2.5, August/October 1999.
150. Bell Atlantic Pre Order Business Rules, Version 2.5.1, September/October 1999.
151. Bell Atlantic Flash Announcement #940, 9/17/99.
152. Bell Atlantic Flash Announcement #944, 9/17/99.
153. Bell Atlantic Flash Announcement #921, 9/19/99.
154. Bell Atlantic Flash Announcement #961, 9/23/99.